

PATRICIA ALBARADO;
ERICA BARRERA, Individually
and ANF of D.R., Minor,
MICHAEL BROWN, Individually
And AND of V.B., Minor, et al.,

V.

Defendants.

**DEFENDANT UNITED PARCEL SERVICE, INC.'S ADVISORY TO COURT
REGARDING NOTICE OF REMOVAL**

1. On or around May 24, 2024, Plaintiffs commenced an action in the 225th District Court, Bexar County, Texas, Case No. 2024CI11581 (the “State Court Action”). Plaintiffs did not serve UPS with the summons and Petition. Nor did Plaintiffs file a proof of service for Defendant FedEx Corporation. (*See* ECF No. 1-1 (“State Court Record”).) Thus, on information and belief, neither Defendant was served prior to UPS’s removal.

2. Neither Defendant is a citizen of Texas. UPS is incorporated in Ohio and maintains its principal place of business in Georgia. FedEx Corporation is incorporated in Delaware and maintains its principal place of business in Tennessee.

3. FedEx Corporation has consented to removal. (ECF No. 1-2.)

4. The case was removed from Bexar County. (*See* State Court Record.)

Dated: July 15, 2024

Respectfully Submitted,

/s/ Lauren A. Valkenaar

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*Attorneys for Defendant
United Parcel Service, Inc.*

CERTIFICATE OF SERVICE

On July 15, 2024, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Western District of Texas, using the electronic case filing system of the Court.

I hereby certify that that the foregoing has been served upon all parties of record in compliance with the Federal Rules of Civil Procedure on July 15, 2024:



BY U.S. MAIL [Fed. Rule Civ. Proc. rule 5(b)] by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, addressed as follows, for collection and mailing at Valkenaar PLLC, 7898 Broadway, Suite 120, San Antonio, Texas 78209 in accordance with Valkenaar PLLC's ordinary business practices.

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Defendant

/s/ Lauren A. Valkenaar

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